

Small Business Administration

Privacy Impact Assessment

For

Joint Accounting and Administrative Management System

(September 2005)

Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the _____ System. This document has been completed in accordance with the requirements of the E-Government Act of 2002.

MANAGEMENT CERTIFICATION – Please check the appropriate statement.

_____ The document is accepted.

_____ The document is accepted pending the changes noted.

_____ The document is not accepted.

_____ **We** fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

System Manager

DATE

OCIO/Project Representative

DATE

Program/Office Head

DATE

OCIO

DATE

Senior Official for Privacy

DATE

Name of Project: Joint Accounting and Administrative Management System
Program Office: Office of Chief Financial Officer
Project's Unique ID:

A. CONTACT INFORMATION:

1. Who is the person completing this document?

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6. Did the Agency's Senior Office for Privacy review this document? Yes.

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7. Who is the Reviewing Official?

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B. SYSTEM APPLICATION/GENERAL INFORMATION:

1. Does this system contain any information about individuals?

(a) Is this information identifiable to the individual?

Yes.

(b) Is the information about individual members of the public?

Yes.

(c) Is the information about employees?

Yes.

2. What is the purpose of the system/application?

The Oracle Administrative Accounting/JAAMS 1.0 is a financial management system. It is used for SBA's administrative accounting only and not for loan accounting. The system is a place of financial record for the funding and expenditure of SBA's administrative funds.

3. What legal authority authorizes the purchase or development of this system/application?

Title 6 General Accounting Office (GAO) Policy and Procedures Manual, 31 U.S.C. Part 285, Sections 112(a) and 113 of the Budget and Accounting Procedures Act of 1950 and 5 USC Chapters 55 through 63 and 15 U.S.C. § 634(b)(6), 44 U.S.C. § 3101.

C. DATA in the SYSTEM:

1. Generally describe the type of information to be used in the system and what categories of individuals are covered in the system?

Citizen: Information is not maintained on citizens in general in the system.

Client/Partner: SBA maintains payment information on grantees and information on the vendors and contractors who provide products and services related to SBA's administrative functions. The information consists of tax IDs, payment information including banking information and addresses.

Employee: SBA maintains information for payments to employees including banking information, addresses, and SSN.

2. What are the sources of the information in the system?

(a) Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?

Both, The SBA receives external data files from NFC (Payroll and Employee information), Bank of America (Credit Card), and FedEx. Furthermore, the SBA processes internal data from the Surety Bond Guarantee (SBG) system.

(b) What Federal agencies are providing data for use in the system?

USDA's National Finance Center (NFC) processes SBA's payroll. The U.S Department of Treasury processes all payment requests generated by this Administrative accounting system and provides confirmations.

(c) What Tribal, State and local agencies are providing data for use in the system?

SBA receives paper requests for payments from state and local agencies for grants. No electronic records are received.

(d) From what other third party sources will data be collected?

Data will be collected from the Bank of America and Federal Express for reconciliation purposes.

(e) What information will be collected from the employee and the public?

Client/Partner: SBA maintains payment information on grantees and information on the vendors and contractors who provide products and services related to SBA's administrative functions. The information consists of tax IDs, payment information including banking information and addresses.

Employee: SBA maintains information for payments to employees including banking information, addresses, and SSN.

3. Accuracy, Timeliness, and Reliability

(a) How will data collected from sources other than SBA records be verified for accuracy?

The US Department of Treasury and the US Department of Agriculture's National Finance Center are subject to the Privacy Act regulations. Information received from the Bank of America and Federal Express is verified against the agency's accounting records for accuracy

(b) How will data be checked for completeness?

Each program office has the responsibility of reconciling the information that is received from the Bank of America and Federal Express. In addition, the system has been built with edits that assure the completeness of records including the generation of errors.

(c) Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).

Yes, the data is current. As part of the financial reporting process, the system records are reconciled at minimum on a monthly basis by the Office of the Chief Financial Officer. The documents include the financial statements and the SF224.

(d) Are the data elements described in detail and documented? If yes, what is the name of the document?

Yes. SBA implemented the Oracle Federal Financials suite of financial applications. The Oracle suite is well documented. SBA has additionally created enhancements to the Oracle functionality using Oracle provided tools. These extensions, that address gaps in functionality, are also well documented.

D. ATTRIBUTES OF THE DATA:

1. Is the use of the data both relevant and necessary to the purpose for which the

system is being designed?

Yes. The data that is collected is necessary for the administrative accounting process for the agency.

- 2. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

The latest data is continually updated in the system as daily, weekly, monthly, and sometimes yearly business cycles are executed. This includes address changes, voucher payments, vendor payments, etc... With the latest data, financial accounting data is continually created and/or updated.

- 3. Will the new data be placed in the individual's record?**

Yes, new data will be placed in the individual's record. E.g.. When an employee voucher payment is made, the information will be reflected in the employee's record.

- 4. Can the system make determinations about employees/public that would not be possible without the new data?**

N/A

- 5. How will the new data be verified for relevance and accuracy?**

The Office of the Chief Financial Officer reconciles data on a monthly basis.

- 6. If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

Data is not being consolidated in this system.

- 7. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.**

Processes are not being consolidated.

- 8. How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.**

Data can be retrieved through ad hoc queries and standard reports. Yes, data can be retrieved by SSN, name, etc...

9. What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?

A variety of reports can be developed as needed. Generally these reports are used for reconciliation purposes. Because of the sensitivity of the data, reports are treated as such. They are only distributed on a need to know basis.

10. What opportunities do individuals have to decline to provide information (i.e. where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses and how individuals can grant consent.)

Suppliers have the right to decline to provide information or consent to uses of the information, but will prevent SBA from the ability to do business with them. For example, create payments for goods and services.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

1. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?

The system is accessed by authorized SBA employees nationwide from the different SBA offices. The system is configured to ensure data consistency and has automated data entry rules to ensure quality of data. One system and set of financial records is in place for all SBA administrative accounting data.

2. What are the retention periods of data in this system?

According to NARA standards, data is retained for 6 years and 4 months.

3. What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?

At the end of the retention period, SBA follows policy to archive data. The JAAMS system is still young (4 years) and has not undergone any records retention at this point.

4. Is the system using technologies in ways that the SBA has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?

No, the system is not using technologies in ways that the SBA has previously employed.

5. How does the use of this technology affect public/employee privacy?

There is no affect. SBA does not use this technology.

6. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.

Yes, the system identifies SBA employees for purposes of making payments to employees. The system does not monitor employees.

7. What kinds of information are collected as a function of the monitoring of individuals?

The system does not use tracking technology to monitor individuals.

8. What controls will be used to prevent unauthorized monitoring?

None, as no monitoring is done.

9. Under which Privacy Act systems of records notice does the system operate? Provide number and name.

SBA 23 – Payroll Files

SBA 33 – Travel Files

10. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.

N/A

F. ACCESS TO DATA:

Who will have access to the data in the system?

- SBA employees with the responsibility of entering and maintaining records related to administrative accounting. Eg. Administrative Officers and Budget Coordinators from the program offices
- SBA Management with approval authority for administrative transactions
- SBA's Office of Procurement and Grants Management personnel related to administrative accounting functions
- SBA's Office of the Chief Financial Officer personnel related to administrative accounting functions. This includes functional users as well as developers.
- Authorized personnel from Corio, the SBA's Applications Service Provider for this system. This includes systems and database administrators.
- SBA's Office of the Chief Information Officer personnel related

2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?

SBA has pre-determined responsibilities for users in the Oracle system which means that specific forms are made available to a user depending on their job function at the SBA. Access is provided by IT Security upon receipt of the written authorization by the user's manager indicating specifically which responsibilities should be associated with the named user. These pre-determined responsibilities are associated with specific authorization and approval levels, job functions, access to certain forms, data entry ability versus inquiry only, ability to modify data, access to certain data, etc. IT Security processes the access requests based on policy.

3. Will users have access to all data on the system or will the user's access be restricted? Explain.

A user's access is based on the responsibility assigned to the user. Therefore, users' access is restricted by responsibility. The pre-determined responsibilities – as described in the question above – assign different forms and types of data to a user. E.g. Inquiry only responsibilities do not allow data entry or modification.

4. What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? (Please list processes and training materials)

For critical processes, 'rules of two' are in place. These rules require that data entry performed by one user is approved by another user. These two functions (data entry and approval) create a separation of duty.

IT Security also conducts bi-annual security reviews of access to Oracle to validate that users are still performing the same job responsibilities within Oracle. The reviews require validation from managers to ensure that the access is appropriate and accurate.

Additionally, critical data tables are audited. User information is also tracked in the system for audit purposes.

5. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?

Yes, the SBA is hosted by IBM. IBM performs an array of functions from Database Administration to functional support. A Privacy Act clause is in the base contract.

6. Do other systems share data or have access to the data in the system? If yes, explain.

No

- 7. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

N/A

- 8. Will other agencies share data or have access to the data in this system (Federal, State, Local, Other)?**

No

- 9. How will the data be used by the other agency?**

N/A

- 10. Who is responsible for assuring proper use of the data?**

N/A